

SAUL EWING ARNSTEIN & LEHR LLP

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Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JEANNE VAN DUZER LANG AND
LARAMIE VAN DUZER SILBER

Plaintiff,

v.

PATIENTS OUT OF TIME, et al.

Defendants.

Civil Action No.: 3:20-cv-00615

NOTICE OF MOTION

(Filed Electronically)

TO: Alan Silber, Esq.
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PLEASE TAKE NOTICE that on March 16, 2020, Defendants Patients
Out of Time, Mary Lynn Mathre, Michael Aldrich, Denis Petro, Irvin Rosenfeld,

Melanie Dreher, Dustin Sulak and Elvy Musikka (“Defendants”), by way of the undersigned counsel, will move before the Honorable Michael A. Shipp, U.S.D.J., at the United States District Court for the District of New Jersey, Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street Trenton, NJ 08608, for an Order dismissing the Complaint filed by Plaintiffs Jeanne Van Duzer Lang and Laramie Van Duzer Silber in its entirety pursuant to Federal Rule of Civil Procedure 12(b)(2) and 12(b)(6), or to alternatively transfer venue to the Western District of Virginia pursuant to 28 U.S.C. § 1406(A). A proposed form of Order is attached to this Notice of Motion. The grounds for this motion are fully set forth in the accompanying brief in support of Defendants’ Motion to Dismiss.

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Attorneys for Defendants

Dated: February 21, 2020

JEANNE VAN DUZER LANG AND
LARAMIE VAN DUZER SILBER

Plaintiff,

v.

PATIENTS OUT OF TIME, et al.

Defendants.

Civil Action No.: 3:20-cv-00615

CERTIFICATION OF SERVICE

I hereby certify that on February 21, 2020, I electronically filed the foregoing **Defendants Patients Out of Time, Mary Lynn Mathre, Michael Aldrich, Denis Petro, Elvy Musikka, Irvin Rosenfeld, Melanie Dreher, And Dustin Sulak's Motion To Dismiss Plaintiffs' Complaint Pursuant To 12(B)(6) And 12(B)(2), Or To Alternatively Transfer Venue Pursuant To 28 U.S.C. § 1406(A)** with the United States District Court, District of New Jersey, through the CM/ECF system, and I further certify that the electronic filing of this document constitutes proper service on all counsel of record pursuant to Local Civil Rule 5.2.

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